

Change/Clarification	Rationale	Impact on Risks
Parsley use moved from cancellation to time-limited.	Benefits are greater than we thought in some areas. This is a very limited use that will be allowed only in OH and NJ to control the carrot maggot. There is no viable alternative to control this pest in parsley. The total use is on less than a 1000 acres. To mitigate risk, the PHI will be 30 days.	Minimal
Move potato use from cancellation to phase-out.	Benefits are greater than we thought in some areas. The label will restrict use to a limited area in Oregon and Washington where AZM is an important tool used to control the Colorado potato beetle. The use would be for about 15,000 acres of potatoes which is primarily aerially applied. Because of concerns for surface water contamination, we will require a 150 foot buffer zone around permanent bodies of water.	Limited overall worker exposure due to mechanical harvesting and potential risk to fish should be reduced with a 150 foot buffer..
Move nectarine use from cancellation to phase-out.	Comments indicate that nectarines are grown in the same blocks as peaches, so should be regulated with peaches. Much of the U.S. nectarine production is in California and AZM is not used on Californian nectarines. Given the unintended impact on the peach use in the rest of the U.S. and the relatively small volume of nectarines grown outside of California, we decided to regulate the two crops together.	Minimal

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Move Southern pine seed use from time-limited to phase out.	Benefits lower than we thought. This use was moved from the time-limited category because we were told that many growers were writing their application contracts for phosmet and pyrethroids, and the US Forest Service no longer plans to fund a harvester exposure study with AZM.	Over time, has the potential to reduce both worker exposure and ecological exposure.
Move caneberry use for canes and soil from time-limited to phase out.	At the time of the IRED, we believed that risk to workers was negligible from cane and soil application and at the currently registered rate of 0.5 lbs ai/acre these uses were important to the production of caneberries. Since the issuance of the IRED, we have learned that a higher rate is needed to provide adequate pest control. However, there is not adequate residue data at this time to support a higher rate. The phase out is to allow any proponent of a higher rate to generate residue data to establish an appropriate PHI.	Negligible.
Move tart cherry use from phase out to time-limited.	Risks lower than we thought. This crop is mechanically harvested, so the risk of concern was to scouts and those performing other lower exposure worker tasks. Since the IRED's issuance, we have learned that scouting consists of checking traps on the edge of the orchard and little to no worker tasks are performed after an AZM application. Change improves label consistency (with sweet cherries), thus improves the likelihood of compliance.	Minimal

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Move nut uses from phase out to time-limited.	Benefits are greater than we thought. Numerous comments were received indicating alternatives are not adequately efficacious. We required exposure data for the harvest-related activities and as well as benefits information to provide additional information should EPA need to assess the risk and benefits of these uses in four years.	No change over next four years.
Added phase out of “ U-Pick ” to the longer PHI proposed in IRED.	In the IRED, we gave the option of a 30-day prohibition after application for “U-Pick” operations or an outright prohibition on the label. Because this exposure would be a part of aggregate risk under FQPA and there is uncertainty about actual exposure, we moved to a prohibition on “U-Pick” in four years.	Increase protection for public.
Some changes in use patterns , such as maximum rates, etc.	In the IRED, we proposed the maximum use pattern reductions we thought were feasible. Based on comments, some minor changes were made in application rates, maximum number of applications, maximum seasonal rates, etc. that are useful to growers without appreciably increasing risk.	Minimal
Require enclosed cab by 10/05.	In 1999 and again in the IRED, the Agency agreed to permit the optional use of full PPE for airblast applicators to allow for growers to completely transition to enclosed cabs. We now are requiring the use of enclosed cabs by 10/05. We have required exposure data comparing the effectiveness of closed cabs and PPE. Should these data demonstrate equivalency, the PPE option could remain on the label.	No change in worker risk over next four years, possible reduction once PPE option is removed.

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<p>Allow aerial use for highbush blueberries.</p>	<p>In the IRED, we prohibited the use of aerial application on high bush blueberries and retained it for lowbush blueberries. For lowbush blueberries, aerial application is the only feasible application method. For highbush blueberries, some ground applications are feasible for limited mid-season use and in dry years in the early season. New information shows that for the highbush blueberry use, aerial application is needed for certain critical times during the growing season. By prohibiting the aerial use, the most critical use of AZM would be infeasible. Therefore, EPA is allowing aerial.</p>	<p>Some potential increase in aquatic exposure. Negligible change in risk to workers.</p>